

TABLE OF CONTENTS

	<u>PAGE</u>
I. INTRODUCTION	1
II. STANDARD OF REVIEW	2
III. SUMMARY JUDGMENT IS APPROPRIATE FOR PLAINTIFF'S CLAIMS	4
1. ALLEGATIONS OF DISCRIMINATION OR DISPARATE TREATMENT WHICH OCCURRED WITHIN 45 DAYS PRIOR TO MARCH 2, 1998	4
A. PLAINTIFF'S CAUSE OF ACTION 11(f)	5
B. PLAINTIFF'S CAUSE OF ACTION 11(g) (1)	8
C. PLAINTIFF'S CAUSE OF ACTION 11(g) (2)	9
D. PLAINTIFF'S CAUSE OF ACTION 11(g) (3)	11
E. PLAINTIFF'S CAUSE OF ACTION 11(h)	13
2. PLAINTIFF CLAIMS DISPARATE TREATMENT AND REPRISAL/RETALIATION FOR HIS MARCH 2, 1998 PRE-COMPLAINT EEO ACTIVITY	14
A. PLAINTIFF'S CAUSE OF ACTION 12 (a)	14
B. PLAINTIFF'S CAUSE OF ACTION 12 (b)	16
C. PLAINTIFF'S CAUSE OF ACTION 12 (c)	17
3. PLAINTIFF CLAIMS DISPARATE TREATMENT AND REPRISAL/RETALIATION FOR FILING HIS JUNE 21, 1998 EEO CLAIM	19
A. PLAINTIFF'S CAUSE OF ACTION 13 (a)	19
B. PLAINTIFF'S CAUSE OF ACTION 13 (b)	20
C. PLAINTIFF'S CAUSE OF ACTION 13 (c)	21
IV. CONCLUSION	25